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Elridge A. Stafford

Executive Director-Federal Regulatory

EX PARTE OR LATE FILED

August 10, 2000

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 - 12th Street, SW, TW-A325
Washington, DC 20554

RE: CC Docket No. 96-98

Dear Ms. Salas:

On Tuesday, August 8, 2000, Andrew Crain, Melissa Newman, Jeff Owens, Dan Poole and the undersigned, representing Qwest, met with Jake Jennings, Julie Patterson, and Katherine Farroba of the Common Carrier Bureau to discuss the status of Qwest's section 271 activities. The attached material was distributed at the meeting and served as the basis of the discussion.

In accordance with Section 1.1206(b)(2) of the Commission's rules, the original and one copy of this letter and attachments are being filed with your office for inclusion in the public record of this proceeding.

Acknowledgment and date of receipt of this submission are requested. A duplicate of this letter is included for this purpose.

Sincerely,

Attachments

No. of Copies rec'd 041
List ABCDE

cc: Katherine Farroba
Jake Jennings
Julie Patterson

Qwest 271 Checklist Workshops

August 8, 2000

Qwest has 271 workshops underway in 11 of its 14 states:

- **Arizona**
- **Colorado**
- **Nebraska (used formal hearings in 1998 and 1999)**
- **Oregon**
- **Washington**
- **Six State Workshop**
 - **Idaho**
 - **Iowa**
 - **Montana**
 - **North Dakota**
 - **Utah**
 - **Wyoming**

Other Qwest 271 Workshops

- 1 **Arizona Performance Assurance Plan**
 - 1 First workshop June 19, 2000
 - 1 2 workshops held in July
 - 1 3 more workshops scheduled through December '00
- 2 **ROC Performance Assurance Plan**
 - 1 Being organized by 11 states, with Qwest support
- 3 **Arizona Third Party Test Workshops**
- 4 **ROC Third Party Test Workshops**

Typical Workshop Schedule

Workshop 1

- Poles, Ducts, Conduit, ROW**
- 911, DA, Operator Services**
- White Page Listings**
- Number Administration**
- Signalling and Databases**
- Dialing Parity**
- Reciprocal Compensation**

Workshop 2

- Interconnection/Collocation**
- Number Portability**
- Resale**

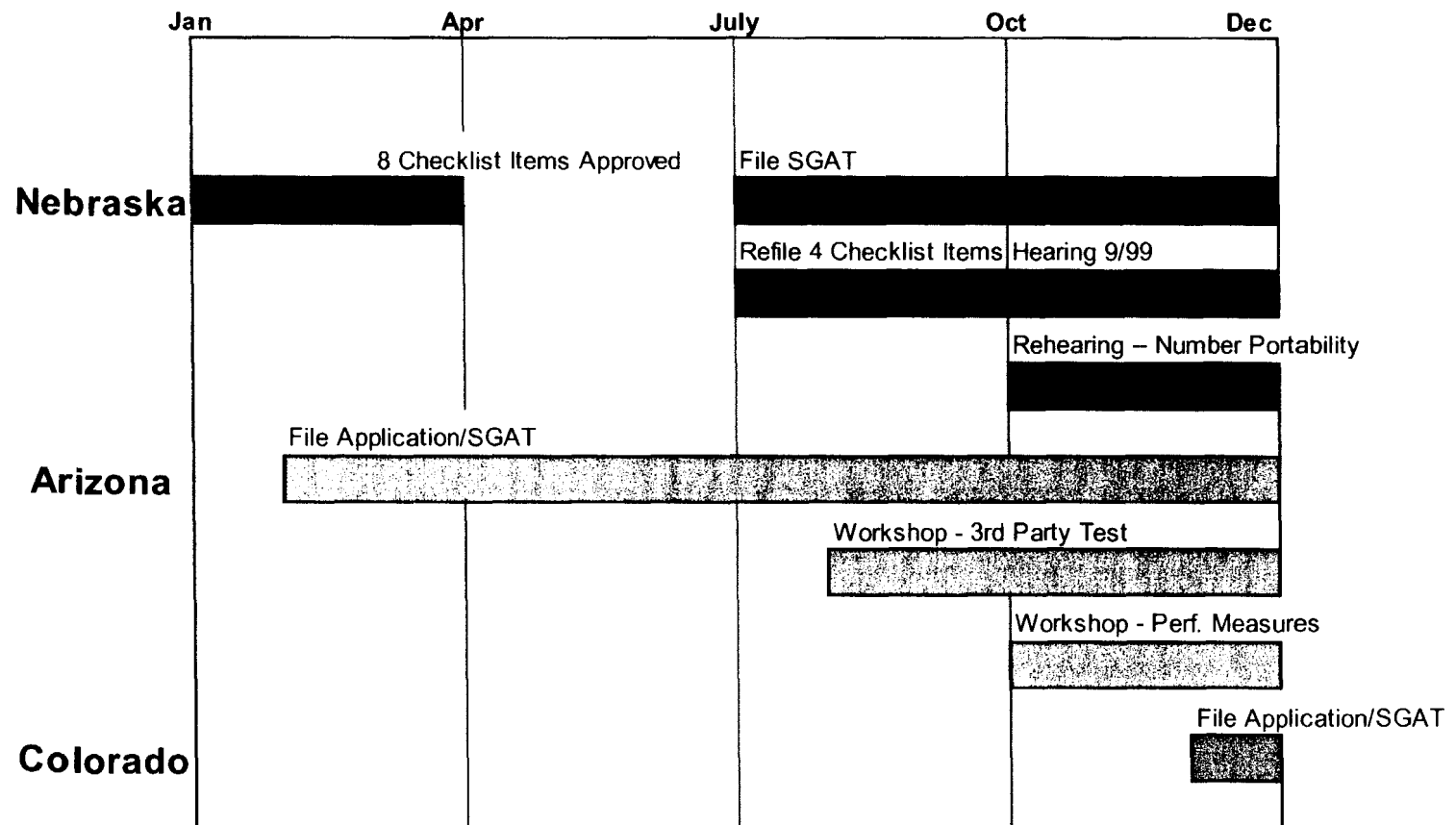
Workshop 3 -- Emerging Services

- Dark Fiber**
- EEL**
- Line Sharing**
- Loop Conditioning**
- Loop Qualification**
- Packet Switching**

Workshop 4

- Loops**
- Switching**
- Transport**
- UNE-P**

271 Schedule - 1999



August 8, 2000

Arizona -- 2000 Schedule

January	April	July	October	December
SGAT Review				
Checklist Workshop	Listings, NXX, Dialing Parity Approved			
	Checklist Workshop	Poles, 911, DA, SS7, Operator, Recip Comp. – Completed, Awaiting Staff Report		
		Checklist Workshop	Interconnection, Colocation, Resale	
			Checklist Workshop	Emerging Services
			Checklist Workshop	UNE-P, Switching, Transport
				Checklist Workshop
				Loops, LNP
		Performance Assurance Plan Workshops		

August 8, 2000

Disputed Issues in Arizona

Issues that were not resolved through consensus and are awaiting dispute resolution by the Arizona Commission:

Reciprocal Compensation

- Rate Level for Tandem Treatment of CLEC Switches**
- Rate Level for Single POI per LATA**
- Transport charges for Host/Remote**
- Commingling of Local Traffic on Special Access facilities**

Nebraska -- 2000 Schedule

January	April	July	October	December
SGAT				
Interconnection/Colocation/UNE Proceeding				
	Conditional approval granted			
			Checklist Workshop	
			Emerging Services	
			Joint with Arizona Workshop	

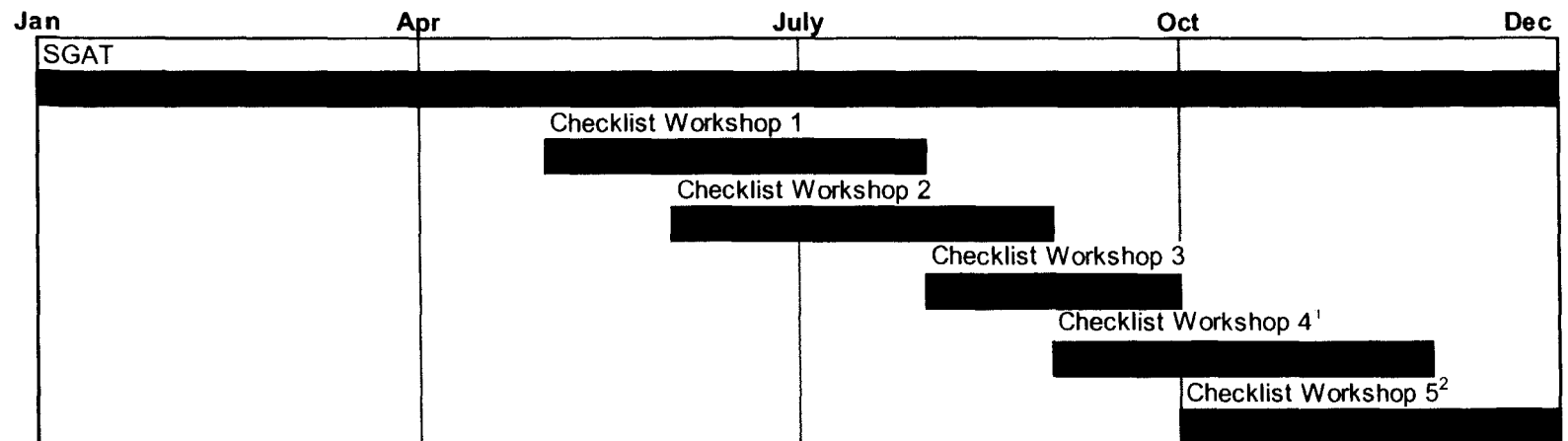
August 8, 2000

Disputed Issues in Nebraska

- 1 **The Nebraska Commission has used a formal hearing process to address 271 issues**
- 2 **There are no 271 issues pending resolution by the Nebraska Commission at this time**
- 3 **Awaiting the upcoming joint Arizona/Nebraska workshop on emerging services**

Awaiting the results of the ROC Third Party Test

Colorado -- 2000 Schedule



¹Includes 272.

²Local Loop and LNP.

August 8, 2000

Disputed Issues in Colorado

Issues that were not resolved through consensus and are awaiting dispute resolution by the Colorado Commission:

- Poles, Ducts, Conduit, ROW**

- Intervals for field verification of large requests

- Reciprocal Access to CLEC Poles, Ducts, Conduit, ROW

- Reciprocal Compensation**

- Rate Level for Tandem Treatment of CLEC Switches

- Rate Level for Single POI per LATA

- Transport charges for Host/Remote

- Commingling of Local Traffic on Special Access facilities

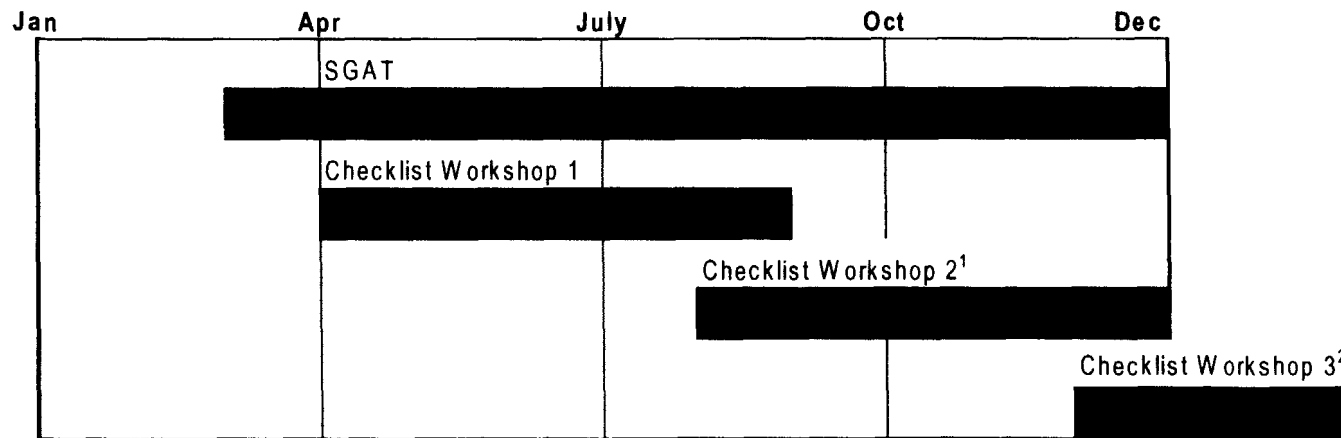
- Cost sharing of Collocation, EICT, MUX

- Inclusion of ISP Traffic on Relative Use Factors for Transport

- Call Related Databases**

- ICNAM Database -- per query access vs. bulk download of database

Washington -- 2000 Schedule



¹Includes 272.

²Includes Public Interest.

August 8, 2000

Disputed Issues in Washington

Issues that were not resolved through consensus and are awaiting dispute resolution by the Washington Commission:

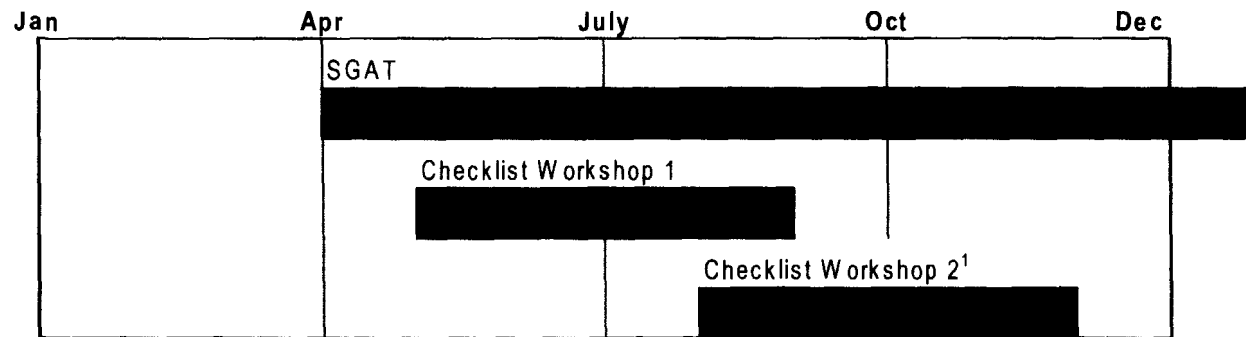
Reciprocal Compensation

- Rate Level for Tandem Treatment of CLEC Switches**
- Rate Level for Single POI per LATA**
- Transport charges for Host/Remote**
- Commingling of Local Traffic on Special Access facilities**
- Cost sharing of Collocation, EICT, MUX**
- Inclusion of ISP Traffic on Relative Use Factors for Transport**
- Reciprocal Compensation on ISP Traffic**

Call Related Databases

- ICNAM Database -- per query access vs. bulk download of database**

Oregon 2000 Schedule

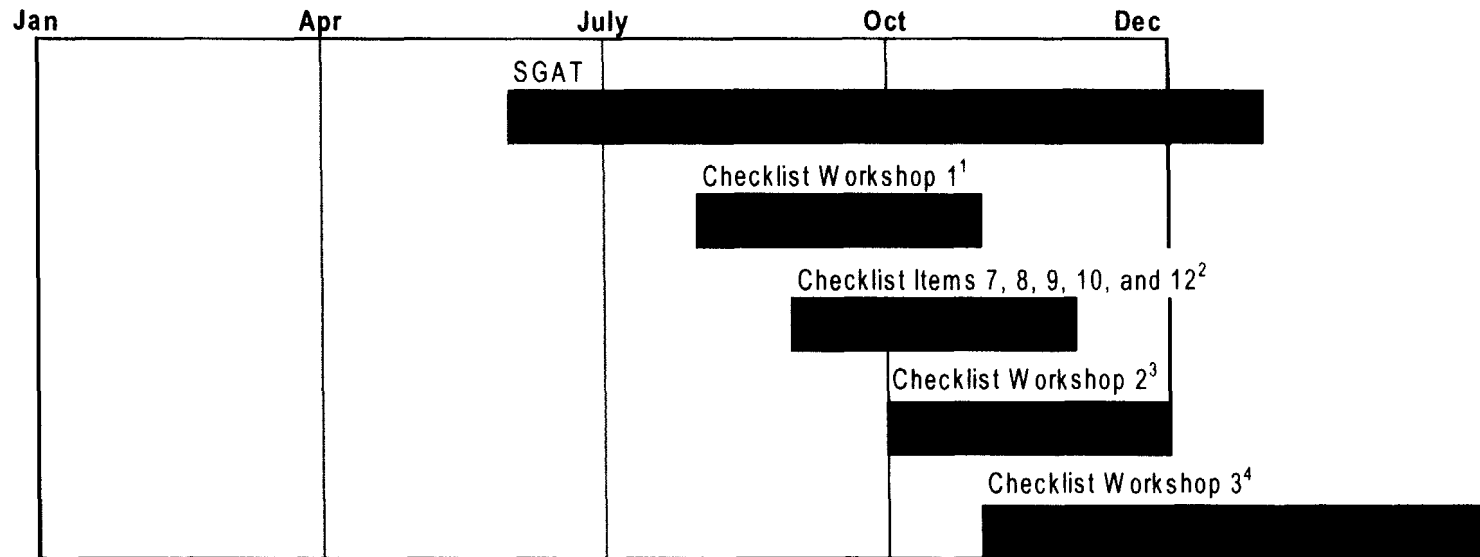


¹Includes 272. Formal schedule to be developed at the close of workshop 1.

Disputed Issues in Oregon

- None at this time
- First workshop begins Wednesday, August 9

Six State Collaborative 2000 Schedule



¹Checklist Items 1, 11, 13, 14, and 272.

²No workshop; process being handled via paper only.

³Emerging Services.

⁴Checklist Items 2, 4, 6, Public Interest, and Track A.

Six State Collaborative

- Will handle six checklist items via a paper proceeding**

- Relying on consensus reached in other state workshops**

- Checklist items include:**

- Poles, Ducts, Conduits, ROW**

- 911, DA, Operator Services**

- White Page Listings**

- Number Administration**

- Dialing Parity**

- Signalling and Databases**

- First Workshop Scheduled for October 3**

- Interconnection, Collocation**

- Number Portability**

- Reciprocal Compensation**

- Resale**

- 272**

Performance Measures

Checklist	CLEC Measures in Production	Retail Comparatives in Production	CLEC Measures under Development	Retail Comparatives under Development	Totals
1	42	16	4	5	67
2	75	7	32	3	117
4	152	60	35	95	342
5	32	14	8	26	80
7	22	16	4	4	46
8	2	0	0	0	2
9	1	1	0	0	2
10	2	0	0	0	2
11	2	0	0	0	2
14	284	284	69	69	706
Total	614	398	152	202	1366

July, 2000

Monday	Tuesday	Wednesday	Thursday	Friday
3	4	5	6 <i>Washington Workshop 1b Checklist items 3,7,8,9,10,12,13</i>	7
10	11	12	13 <i>Arizona Workshop Backsliding & Penalty Issues</i>	14
17	18	19	20	21
24	25 <i>Arizona Workshop Backsliding & Penalty Issues</i>	26	27	28
31				

August, 2000

Monday	Tuesday	Wednesday	Thursday	Friday
	1 <i>Colorado Workshop 2</i> <i>Checklist Items 1, 14</i>	2	3	4
7	8	9	10 <i>Oregon Workshop 1</i> <i>Checklist Items 3, 7, 8, 9, 10, 12, 13</i>	11
14	15	16 <i>Arizona Workshop</i> <i>Checklist Items 1, 11, 14</i>	17	18
21	22 <i>Arizona Workshop</i> <i>Backsliding & Penalty Issues</i>	23	24	25
28	29	30	31	

September, 2000

Monday	Tuesday	Wednesday	Thursday	Friday
				1
4	5	6	7	8
11	12	13	14	15
		Arizona Workshop Advanced Services		
18	19	20	21	22
		Colorado Workshop 2 - Followup Checklist Items 1, 14		
25	26	27	28	29

October, 2000

Monday	Tuesday	Wednesday	Thursday	Friday
2	3	4	5	6
	Multi-State Workshop 1 (Salt Lake City) Checklist Items 1, 11, 13, 14, 272			
9	10	11	12	13
	Arizona Workshop Checklist Items 2, 5, 6			
16	17	18	19	20
	Arizona Workshop Backsliding & Penalty Issues			
23	24	25	26	27
30	31	1	2	3
	Colorado Workshop 3 Emerging Services			

November, 2000

Monday	Tuesday	Wednesday	Thursday	Friday
		1 <i>Colorado Workshop 3 Emerging Services</i>	2	3
6	7	8	9	10
		<i>Washington Workshop 2a Checklist Items 1, 11, 14, 272</i>		
13	14	15	16	17
		<i>Arizona Workshop Checklist Items 4, 11 (LNP)</i>		
20	21	22	23	24
<i>Arizona Workshop Backsliding & Penalty Issues</i>				
27	28	29	30	1
	<i>Washington Workshop 2b Checklist Items 1, 11, 14, 272</i>		<i>Arizona Follow-up Workshop Checklist Items 4, 11 (LNP)</i>	

December, 2000

Monday	Tuesday	Wednesday	Thursday	Friday
			30 <i>Arizona Follow-up Workshop Checklist Items 4, 11 (LNP)</i>	1
4	5	6	7	8
11	12	13	14	15 <i>Colorado Workshop 4 Checklist Items 2, 5, 6, 272</i>
18 <i>Multi-State Workshop 2 (Boise/Helena) Emerging Service</i>	19	20	21	22
25	26	27	28	29

January, 2001

Monday	Tuesday	Wednesday	Thursday	Friday
1	2	3	4	5
8	9	10	11	12
15	16	17	18	19
22	23	24	25	26
Colorado Workshop 5 Checklist Items 4, 11				
29	30	31		

February, 2001

Monday	Tuesday	Wednesday	Thursday	Friday
			1	2
5	6	7	8	9
12	13	14	15	16
19	20	21	22	23
26	27	28		

March, 2001

Monday	Tuesday	Wednesday	Thursday	Friday
			1	2
5	6	7	8	9
12	13	14	15	16
Washington Workshop 3a Checklist Items 2, 4, 5, 6, Public Interest				
19	20	21	22	23
26	27	28	29	30
Washington Workshop 3b Checklist Items 2, 4, 5, 6, Public Interest				
Workshop #3 (Des Moines) Checklist Items 2, 4, 6, Public Interest, Track A				

April, 2001

Monday	Tuesday	Wednesday	Thursday	Friday
2	3	4	5	6
9	10	11	12	13
16	17	18	19	20
23	24	25	26	27
30				

May, 2001

Monday	Tuesday	Wednesday	Thursday	Friday
	1	2	3	4
7	8	9	10	11
14	15	16	17	18
21	22	23	24	25
28	29	30	31	

June, 2001

Monday	Tuesday	Wednesday	Thursday	Friday
				1
4	5	6	7	8
11	12	13	14	15
18	19	20	21	22
25	26	27	28	29

July, 2001

Monday	Tuesday	Wednesday	Thursday	Friday
2	3	4	5 <i>Washington Follow-up Workshop #4 (if needed)</i>	6
9	10	11	12	13
16	17	18	19	20
23	24	25	26	27
30	31			

FCC Pre-Filing Meeting Schedule
PRE-FILING 271 MEETING SCHEDULE

DATE	TOPIC	NOTES
7/24	<ul style="list-style-type: none"> ❖ Collaborative process <ul style="list-style-type: none"> - focus on 5 state process 	
8/8	<ul style="list-style-type: none"> *Feedback from FCC staff on 5 state collaborative process *pre-file application process and status update procedure *OSS performance measure <ul style="list-style-type: none"> - loop provisioning intervals - preorder response times - ROC performance measures *FCC staff request: how does Qwest intend to meet line sharing and UNE obligations – evidentiary showing 	
9/12 2 weeks after Washington and A3 staff reports are due	<p style="text-align: center;"><u>Checklist Items</u></p> <ul style="list-style-type: none"> 3: Access to Poles, Ducts, Conduit and Rights of Way 7: 911/ E911; Directory Assistance; Operator Completion Services 8: White Pages Directory Listing 9: Numbering 10: Signaling Databases <ul style="list-style-type: none"> - Overall - 557 - Call Related Databases - AIN - 12: Local Dialing Parity - 	

FCC Pre-Filing Meeting Schedule

DATE	TOPIC	NOTES
9/13 [FCC and DOJ meeting]	KPMG: Discuss Master Test Plan	
10/16	<u>Checklist Items</u> 11: Interconnection <ul style="list-style-type: none"> - LRN - Trunking - Collocation 14: Resale (non- OSS) <ul style="list-style-type: none"> - pricing 13: Reciprocal Compensation <ul style="list-style-type: none"> - non- ISP traffic 	
10/17 (FCC meeting 1 week before ROC meeting in Denver)	*ROC OSS Status Update *FCC Feedback on Master Test Plan	
10/19-10/20 [FCC and DOJ meeting]	*Performance Measure *Statistical Issues	
10/30 [FCC and DOJ meeting]	Public Interest <ul style="list-style-type: none"> - backsliding and penalty measures Emerging Services	
11/13 (FCC meeting 2-4 weeks after workshops are concluded)	<u>Checklist Items</u> 2: Unbundled Network Elements (general) 5: Transport 6: Switching <ul style="list-style-type: none"> - Platform 	

FCC Pre-Filing Meeting Schedule

DATE	TOPIC	NOTES
2 nd week of Nov.	*OSS Demonstration and Field Trip to Denver * ROC OSS Test Update	
11/20 [FCC and DOJ meeting]	FCC feedback on performance measures	
12/11-12/12 [FCC and DOJ meeting]	*Review Initial OSS Test Results	
1/08/01	<p style="text-align: center;">Checklist Items</p> <p>4: Unbundled Loops</p> <ul style="list-style-type: none"> - basic hot cuts - complex - XDSL - Line Sharing - Riser 	
2/05/01	<p style="text-align: center;">Topic</p> <p>*272 compliance *Pricing *ROC Status Update *Track A (residential competition)</p>	
4 weeks before application is filed at FCC	*Review of Qwest application procedures	